

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA

v.

PEDRO ANTHONY ROMERO CRUZ,  
JOSE LOPEZ TORRES,  
JUAN CARLOS MARCOS AYALA,  
JAIME ROSALES VILLEGAS,  
ALVIN GAITAN BENITEZ,  
CHRISTIAN LEMUS CERNA,  
ARAELY SANTIAGO VILLANUEVA,  
OMAR DEJESUS CASTILLO,  
DOUGLAS DURAN CERRITOS,  
**MANUEL ERNESTO PAIZ GUEVARA,**  
GENARO SEN GARCIA,  
OSE DEL CID,  
JESUS ALEJANDRO CHAVEZ,  
Defendants

No. 1:14-CR-306 - GBL

**MANUEL ERNESTO PAIZ GUEVARA’S**  
**OBJECTION LEARNED COUNSEL, DAVID BAUGH’S**  
**MOTION TO WITHDRAW**

Manuel Ernesto Paiz Guevara, by counsel W. Michael Chick, Jr., hereby objects to David Baugh’s motion to withdraw. Mr. Manuel Paiz Guevara adopts and incorporates – without restating herein – all that has previously been filed and stated on the record concerning these issues. Mr. Paiz Guevara’s objection is based on (1) his statutory right to two lawyers under 18 U.S.C. § 3005 and United

States v. Boone, 245 F3d 352 (4<sup>th</sup> Cir. 2001); (2) his constitutional rights to effective assistance of counsel and a fair trial; and (3) his comfortability and satisfaction with Mr. Baugh as his counsel. We also state the following:

1. Mr. Chick was first contacted about possible appointment to this case, by then Federal Public Defender Michael S. Nachmanoff in the early fall or late summer of 2014.
2. During that conversation, Mr. Chick indicated that he lacks experience in federal court and that he had reservations about being lead counsel on a case such as this.
3. Mr. Chick was assured that his appointment by the Court would also be alongside a highly experienced Learned Counsel, and that that person would likely be David Baugh.
4. Mr. Chick indicated that under those circumstances he certainly felt comfortable accepting such an appointment.

Mr. Paiz Guevara objects to Mr. Baugh's motion to withdraw. He wishes to proceed to trial under his statutory right to two lawyers: a Learned Counsel and an associate counsel. And he requests that those be the same lawyers he has had from the beginning of this matter; however, because the Court has denied our previous motions to sever and to continue, Mr. Baugh is unable to represent

Mr. Paiz Guevara on the current trial date, and Mr. Paiz Guevara is continuing to trial on that date under objection.

Respectfully submitted,

**MANUEL ERNESTO PAIZ GUEVARA**

By: \_\_\_\_\_/s/\_\_\_\_\_  
W. Michael Chick, Jr.  
VSB: 70892  
Attorney for Defendant Manuel Paiz Guevara  
Law Offices of W. Michael Chick, Jr.  
10513 Judicial Drive, Suite 102 Fairfax, Virginia 22030  
Tel: 571.276.8279  
Fax: 571.748.4399  
[mike@chicklawfirm.com](mailto:mike@chicklawfirm.com)

#### CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing was duly served via ECF, upon:

Stephen M. Campbell, Esq.  
Julia K Martinez, Esq.  
Tobias Tobler, Esq.  
Assistant United States Attorneys  
Eastern District of Virginia  
2100 Jamison Avenue  
Alexandria, Virginia 22314

And all other defendants in this matter by the Court's electronic filing system.

\_\_\_\_\_/s/\_\_\_\_\_  
W. Michael Chick, Jr.